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April 8, 2021

**Via ECF**

**The Honorable Sandra J. Feuerstein**  
United States District Court  
for the Eastern District of New York  
Long Island Courthouse  
100 Federal Plaza  
Central Islip, NY 11722

Re: *Tenzer-Fuchs v. Alan Furman & Co., Inc.*  
Case No. 2:21-cv-01178-SJF-AKT  
***Consent Extension Request Letter***

Dear Judge Feuerstein:

I represent Defendant Alan Furman & Co., Inc. ("***Furman***") in the above-referenced matter. This letter seeks Court approval of a one-month extension for my client to respond to the Complaint.

Furman was served with this Complaint on March 22, 2021, and thus, it is required to file a responsive pleading on or before April 12, 2021. Since Furman has been served with the complaint, Furman and Plaintiff Michelle Tenzer-Fuchs have been involved in active settlement negotiations.

Given the active settlement negotiations, the parties feel it would be in their best interest to conserve their resources in an effort to settle this matter prior to having to engage in active litigation. The parties have agreed that a one-month extension should be sufficient for the parties to explore settlement further. Accordingly, the parties request an extension of the deadline for Furman to respond from April 12, 2021, to **May 12, 2021**.

Thank you for your consideration.

Sincerely,

Craig J. Franco (to seek admission *pro hac vice*)

Pre-Motion Conference Request Letter

September 9, 2020

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cc: All Registered Counsel of Record. (*via ECF*)